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## **BY ECF**

The Honorable Judge Alvin K. Hellerstein United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007 So ordered; however, if granting this application will prejudice the conditions of other defendants, the government shall provide an alternate means for defendant to have access to discovery materials, as requested by counsel.

So ordered, /s/ Hon. Alvin K. Hellerstein March 18, 2021

Re: United States v. Hector Cerezo, 20 CR 589 (AKH)

Dear Judge Hellerstein:

We write to apprise the Court of certain logistical difficulties related to defendant Hector Cerezo's ability to review discovery in the above-captioned matter.

Mr. Cerezo is currently incarcerated at the MDC. The Government provided discovery electronically on an external drive, which was delivered to the MDC on February 1, 2021. Given various restrictions, including lengthy periods of lockdown due to Covid-19 quarantines, inmates in Mr. Cerezo's unit have been allowed access to a computer for approximately 30 to 45 minutes per day to review discovery materials. We attempted to mitigate the situation by sending Mr. Cerezo paper copies of the portion of the Government's discovery that could be transmitted via a hard copy. However, there are several lengthy videos in the Government's discovery for which Mr. Cerezo has had insufficient time to access and review.

Accordingly, we respectfully request that the Court issue an Order requesting that the authorities at the MDC allow Mr. Cerezo up to two hours per day during which he can access a computer to review the discovery materials in his case.

Respectfully submitted,

/s/ Jessica A. Masella
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